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Document Control Office (7407)
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Re: Proposed Test Rule for Methyl Methacrylate OPPTS-42 18A

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To whom it may concern:

CYRO Industries, a manufacturer of methyl methacrylate (MMA), urges EPA not to issue its proposed test rule for MMA. The substantially completed Toxicological Review of MMA, developed as part of the Agency's IRIS Pilot Program, finds the existing MMA database fully adequate to assess inhalation risks and to establish an up-to-date Reference Concentration (RfC).

EPA's IRIS Draft Review (at pp. 74-76) derives an RfC for MMA in which the Agency has "medium to high confidence". This RfC is based on a "high" quality long-term rat inhalation study for which additional histopathological examinations were commissioned by the Methacrylate Producers Association, Inc. (MPA). EPA finds the overall database, including developmental studies it finds "acceptable" in both mice and rats, strong enough that "0 uncertainty factor is applied to the RfC for database deficiencies". The Agency further finds that the three-fold uncertainty factor it employs to account for interspecies extrapolation may be able to be reduced once it is able to review the PBPK model developed for MPA by Dr. Melvin Andersen at EPA's request.

The comprehensive assessment of the MMA database in EPA's Draft IRIS Review, in contrast to the cursory review in the HAPs support document, establishes that there is no need for further studies to assess MMA risks. Moreover, when EPA undertook its risk based review of all hazardous air pollutants, it ranked MMA near the bottom of the list based on an analysis that found it had low toxicity (59 Fed. Reg. 15504, 15549-15563 April 1, 1994).

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A TSCA Section 4 testing can be required only when EPA has provided evidence (TSCA Section 19(c)(1)(B)(I)) of potential significant risk or substantial exposure and, in either case, a documented need for additional data to assess unreasonable risk. By moving forward with its IRIS Pilot Program evaluation, the Agency has clearly shown that the MMA data are fully sufficient to complete an inhalation risk evaluation.

CYRO Industries urges EPA to recognize that it cannot justify the unwarranted and potentially contentious multi-million dollar Section 4 test rule for MMA.

Sincerely,


Samuel L. Brogli
CYRO Industries